

**TECHNICAL REVIEW AND EVALUATION  
OF SIGNIFICANT PERMIT REVISION #31767  
TO AIR QUALITY PERMIT M190310P1-00 FOR  
ARIZONA PORTLAND CEMENT COMPANY**

**I. INTRODUCTION**

This significant permit revision No. 31767 is for Arizona Portland Cement Company (APCC), for their Portland cement plant in Rillito, AZ. This permit revision will incorporate a Property Boundary Monitoring Plan (PBMP) to monitor visible emissions across the fenceline between the facility and the Rillito community, as required by the facility's Title V permit. The original application also requested the incorporation of a Phase I Dust Control Plan (DCP) into the permit. The DCP was part of the RIMOD III Project. However, since the application was submitted, the Permittee has not implemented the RIMOD III Project, and has submitted an application for a different expansion project, known as the Kiln 6 Project. Therefore, the DCP is not included in this Significant Permit Revision.

**Company Information**

<b>Facility Name:</b>	Arizona Portland Cement Co., Rillito Plant
<b>Facility Address:</b>	11115 North Casa Grande Highway Rillito, AZ 85654
<b>Mailing Address:</b>	PO Box 338 Rillito, AZ 85654

**II. FACILITY DESCRIPTION**

APCC manufactures Portland cement from limestone extracted from its quarry. The facility operates four kilns along with material handling facilities, coal handling facilities, as well as mills and other equipment for the cement manufacturing process.

**III. PERMIT REVISION DESCRIPTION**

**A. Property Boundary Line Monitoring**

The Permittee is required to install cameras to monitor visible emissions crossing the property boundary. The Permittee is required to install two cameras, looking east, one at the southwest corner of the Pima County Waste Water Treatment facility, and one on the east end of the waste water treatment plant (see Figure 2). Both cameras must be mounted high enough to see over any obstacles.

**B. Data Review and Reporting**

The Permittee is required to review the data on a daily basis for each business day and on holidays or weekends when coal unloading occurs. If this daily review of the data shows any visible emissions relating to the Permittee's activities crossing the property boundary line, the Permittee is required to report the emissions to ADEQ as an excess emission event, as well as to take appropriate corrective action. The Permittee is also required to submit the photographic data to ADEQ on a monthly basis.